

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

PA ADVISORS, LLC,,

Plaintiff Civil Action No. 2-07cv-480

v.

GOOGLE, INC. et al

JURY TRIAL DEMANDED

Defendants

PLAINTIFF'S DEPOSITION DESIGNATIONS

KEY FOR OBJECTIONS						
General Objections:	Form Objections:					
R – Relevance	L – Leading					
P – Fed. R. Evid. 403: Prejudicial	Arg – Argumentative					
H – Hearsay	A – Assuming Facts Not in Evidence					
F – Lacks Foundation	C – Compound					
I – Incomplete	N – Narratives					
V – Vague and ambiguous						
MIL – Subject matter covered by motion <i>in limine</i>						
S – Beyond the scope of Rule 30(b)(6) deposition topics						

	Plaintiff's Designations Defendants' Counter- Designations			Dfdts.' Objections to Pl.'s Designations	
DEPONENT	BEGIN	END	BEGIN	END	
Sanjay Data	15:8	15:23	15:9	15:23	I^1
	26:9	26:16			R, P
	27:3	27:23			R, P
	27:25	28:19			R, P
	29:5	31:1			R, P

Where defendants state an objection or objections to a designation, but do not provide a counter-designation, defendants have objected to that designation in its entirety. Where defendants state objections but also provide a counter-designation, defendants have objected to the designation for the stated bases, but provided the non-objectionable portions of the citation, or the portions of the transcript necessary to make the testimony complete.

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations	
DEPONENT	BEGIN	END	BEGIN	END		
	42:14	44:3				
	44:5	44:14				
	44:16	44:21				
	44:23	45:5				
	45:7	45:9				
	45:12	46:3				
	46:16	46:22				
	48:8	48:19				
	48:21	49:7				
	49:9	49:19				
	49:21	50:3				
	50:5	50:22				
	51:6	51:13				
	51:15	51:19	51:15	51:17	I	
	52:24	53:16				
	53:18	54:4				
	54:6	54:11				
	54:13	55:16				
	56:5	56:9				
	56:21	57:12				
	59:12	59:13			R, P, V, F	
	59:15	59:22			R, P, V, F	
	59:24	60:3			R, P, V, F	
	60:5	61:23			V, F	
	61:25	62:12				
	65:3	65:6			V	
	65:8	65:10			V	
	65:12	65:21				
	66:17	66:21			V, F	
	66:23	67:6			R, P, V, F	
	67:8	67:20				
	75:3	75:6				
	77:19	78:2			V, S	
	78:4	78:22			V, S V, F, S	
	78:24	79:4				
	79:6	80:1				
	80:3	80:3				
	84:13	84:14			V	
	84:16	84:24			R, P	
Ivan Markman	9:16	9:22			ĺ	
	10:1	10:6				

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations	
DEPONENT	BEGIN	END	BEGIN	END		
	10:9	10:9		·		
	14:17	14:20				
	15:1	15:4				
	18:25	20:5				
	20:14	21:11			P, R	
	22:13	23:5			Í	
	23:16	23:24				
	24:4	24:19	24:20	24:22		
	25:5	25:12			P, R	
	32:3	32:6	32:21	32:25		
	39:2	39:5				
	39:12	39:18				
	53:15	55:6			MIL, P, R	
	69:6	69:21			P, R	
	71:16	72:9				
	79:8	79:19			P, R	
	84:23	85:20				
	87:18	90:16				
	92:16	96:11				
	111:4	112:1			P, R	
	116:9	116:21				
	124:17	126:10	127:4	128:5		
	130:18	131:9	131:16	131:20		
Gabriel Mattera			7:6	7:7	I	
	9:19	9:25				
	51:4	51:13	51:14	51:14	R, P, V	
	51:15	52:6	52:7	52:7	R, P, V, F	
	52:8	52:15				
	60:2	61:24				
	65:22	69:4				
	115:4	115:11			R, P	
	118:10	118:25			R, P	
Carlton Robinson	11:10	11:20				
	18:16	18:17				
	20:24	21:4	21:5	22:12		
	28:15	29:3				
	29:12	29:18				
	40:12	41:17			MIL, P, R	
	42:16	43:5			P, R	
	45:24	45:25				
	46:3	46:15				

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations	
DEPONENT	BEGIN	END	BEGIN	END	Designations	
	46:25	47:8	47:9	47:22		
	51:20	52:2	52:5	52:8	P, R, S	
	52:9	52:13			P, R, S	
	56:23	57:7				
	61:22	62:2	62:3	62:4	P, S	
	62:5	62:11	62:12	62:19	P, S	
	76:15	76:20				
	77:8	78:25	79:1	79:13		
	79:14	79:23	79:24	80:5		
	80:6	80:18	80:19	80:24	S	
	80:25	81:10	81:14	81:17	P, S	
	81:19	82:4			S	
	86:20	87:6	86:10	86:19	S	
			87:7	87:11		
	91:6	91:17				
	93:15	94:4				
	95:10	96:3			P, R	
	100:6	100:16	100:17	101:15		
	101:16	101:25	102:1	102:9		
	104:20	106:03	106:4	106:8		
	106:11	107:22			P, R	
	108:8	109:17				
	112:11	113:21	114:5	114:12	P, R	
	114:13	114:25				
	115:3	116:7			P, R	
	127:7	127:18				
	128:18	129:17				
Eric Schulman	13:1	13:13				
	16:16	17:7				
	17:9	17:17				
	23:24	23:25			R, P	
	24:2	24:3				
	26:6	26:7				
	26:9	26:12				
	26:14	26:17				
	26:19	26:19	27:1 27:8	27:4 27:22	I	
	28:10	28:11				
	28:13	28:16				
	28:19	28:24				
	29:3	29:14				

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations	
DEPONENT	BEGIN	END	BEGIN	END	8	
	29:17	29:18	29:19	30:14	I	
	30:24					
	30:25					
	31:4	31:22				
	31:25	32:16			R, P	
	33:2	33:13			R, P	
	33:15	34:5	33:25	34:5	R, P	
	34:7	34:20				
	34:22	35:15				
	36:11	36:16				
	39:25	40:1				
	40:3	40:9				
	40:11	40:13				
	40:15	40:19				
	42:7	42:8				
	42:10	42:21			R, P	
	45:14	45:18			R, P	
	45:20	45:21				
	46:7	46:12				
	46:21	46:22				
	46:24	47:10				
	47:12	47:18				
	47:22	48:4				
	48:6	48:6				
	48:8	48:11				
	48:13	48:17			R, P	
	49:5	49:12			R, P	
	54:8	55:17			R, P	
	55:21	55:24			R, P	
	58:1	58:2			R, P	
	58:4	58:4			R, P	
	58:9	58:20	58:18	58:20	R, P	
	58:22	58:24				
	59:1	59:21	59:1	59:9	R, P	
	62:8	62:9				
	62:12	62:19				
	62:21	62:25				
	63:3	63:14				
	63:22	63:25				
	64:2	64:6				
	64:8	64:24				

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations
DEPONENT	BEGIN	END	BEGIN	END	Designations
	65:3	65:16	65:3	65:7	R, P
	65:19	65:21			R, P
	66:21	66:23			R, P
	67:2	67:3			R, P
	75:9	75:12			R, P
	75:14	75:24			R, P
	76:10	76:13			R, P
	79:10	79:20			R, P
	81:8	81:12			R, P
	81:14	81:24			R, P
	82:11	82:13			R, P
	82:15	83:3			R, P
	83:5	84:2			
	86:18	88:2			
	88:4	88:14	88:19	88:20	I
	88:16	88:17			R, P
	89:15	90:15			R, P
	90:25	91:17			R, P
	92:12	93:3			R, P
	94:6	94:12			R, P
	95:16	96:16			R, P
	96:20	97:5			R, P
	97:9	97:11			R, P
	99:6	99:10			R, P
	100:19	101:5			
	101:19	101:21			
	120:14	120:17			
	120:21	121:6			
	121:8	121:21			
Luke Yeh	11:15	12:9			
	12:15	12:16			
	12:19	12:23			
	13:1	13:9			R, Arg
	13:12	13:22			R, Arg
	13:25	14:9			R, C
	14:12	14:15			R
	14:18	15:6			R
	16:15	17:12			
	17:15	17:23			
	24:2	24:5			
	24:9	25:21			R, P

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations
DEPONENT	BEGIN	END	BEGIN	END	9
	27:10	27:18			R, P
	28:2	28:15			R, P
	28:18	31:5			R, P
	31:8	31:12			
	32:12	33:2			R, P
	33:7	33:12			
	33:21	33:24			
	34:2	35:18			R, P
	35:24	37:2	43:3	43:9	Ĭ
	37:5	37:14			
	38:14	39:11			R, P
	41:3	41:11			R, P
	41:14	41:25			R, P
	42:3	42:16			
	43:13	44:10			R, P
	44:13	44:18			
	44:21	45:4			
	45:7	45:17			
	45:20	46:1			R, P
	46:4	46:9			R, P
	46:12	46:19			R, P
	48:17	49:19			
	51:9	52:14			R, P, F
	52:17	53:2			R, P
	53:5	53:7			R
	54:2	54:5			R
	54:8	54:16			R
	54:19	55:2			R
	55:5	59:15			R
	60:14	60:16			
	61:3	62:24			
	63:12	63:20			R, P
	63:23	64:21			R, P
	64:24	64:25	65:2	65:22	R, P
	68:14	68:19			,
Edward Etkin	7:14	7:16	Defendants' in designations		
	8:18	11:2			1
	19:2	21:4			R, P, MIL
	33:3	33:14			, ,
	34:20	35:3			

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations	
DEPONENT	BEGIN	END	BEGIN	END		
	49:2	49:20				
	61:23	62:14	61:23	62:3	R. P	
	64:15	65:6	64:7	64:11	R, P	
			64:13	64:14		
			65:7	65:14		
	74:17	77:18				
	78:12	79:8	79:9	80:6	I	
	80:7	81:11	81:13	82:7	I	
	82:8	83:8	83:9	83:16	I	
	85:6	85:21	84:14	85:5	I	
			85:22	86:11		
	151:11	154:2				
	224:17	227:18				
	231:19	232:14			R	
	248:4	252:8			L, F	
	253:24	254:15	252:20	253:23	I	
			254:16	255:10		
	255:13	256:7	256:8	256:15	I	
Devesh Patel	10:15	11:4	Yahoo objects to this entire deposition			
	11:7	14:8	because nXn, LLC. has not properly			
	14:11	25:1	designated the testimony that is seeks to play at trial. Instead, nXn, LLC. chose to			
	25:4	26:9				
	26:12	28:24		ly the entire de		
	29:2	29:17		ng to provide o		
	29:20	32:7		n, LLC. engages		
	32:10	43:25		designate a reas	sonable	
	44:20	45:1	amount of test	amony.		
	45:4	46:9				
	46:12	48:4				
	48:7	51:6				
	51:9	62:2				
	62:5	63:5				
	63:8	66:2				
	66:4	68:18				
	68:21	70:14				
	70:17	73:6				
	73:9	74:15				
	74:18	74:25				
	75:15	75:22				
	75:25	76:9				
	76:12	78:2				

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations	
DEPONENT	BEGIN	END	BEGIN	END		
	78:4	78:12				
	80:12	81:12				
	82:8	82:11				
	82:18	84:21				
	85:2	86:13				
	86:20	86:25				
	87:3	91:5				
	91:8	91:13				
	91:16	101:16				
	101:19	102:3				
	102:11	102:13				
	102:16	104:21				
	105:22	107:6				
	107:9	112:4				
	112:14	113:2				
	114:6	116:11				
	116:14	125:16				
	125:19	130:19				
	130:21	131:16				
	131:19	135:15				
	135:18	140:25				
	142:18	142:20				
	144:24	145:4				
Chauman Brewer			8:21	9:4	I	
	10:20	15:23			R, P	
	16:1	17:14			R, P	
	17:21	19:2	18:8	19:2	R, P	
	19:9	21:6	19:9	19:25	R, P, F	
			20:4	21:6		
	21:8	22:13	21:8	21:12	R	
			21:21	22:13		
	22:15	22:15				
	22:23	25:5			R, P, MIL	
	25:12	26:10	26:6	26:10	R, P, S	
	26:12	28:7			S	
	28:19	29:20			S	
	29:23	31:24			S	
	32:4	33:1			F, I	
	33:6	35:23	33:6	33:23	R, P	
	35:25	37:10	35:21	35:23	R, P, S, V	
			35:25	37:3		

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations	
DEPONENT	BEGIN	END	BEGIN	END		
	37:12	40:15	39:5	40:15	R, P, MIL,	
					S	
	40:18	40:18			V	
	40:21	41:5			S	
	41:9	41:14			R, P, S	
	41:17	42:2			R, P, S	
	42:4	42:8			R, P	
	43:1	44:17	43:11	44:17	R, P, I	
	45:25	46:7				
	46:12	48:16				
	48:20	48:22			R, P, MIL, V, F	
	48:24	49:21	48:25	49:21	R, P, MIL, V, F	
	50:3	50:15				
	51:4	52:11	51:4	51:19	R, P, S	
	52:14	54:2			R, P, S	
	54:4	54:17			R, P, V	
	54:19	55:18			R, P, S	
	55:20	57:6	56:7	57:6	R, P	
	57:8	57:17			R, P, MIL	
	58:2	58:5			R, P, MIL	
	58:7	59:13			R, P, MIL	
	59:17	59:19			R, P, MIL	
	59:21	60:7			R, P, MIL	
	60:10	62:22			R, P, MIL, S	
	62:25	64:19			R, P, S, MIL	
	64:22	65:14			R, P, MIL	
	65:19	65:19			R, P, MIL	
	67:20	68:17			R, P, MIL	
	68:20	73:15			R, P, I, V, MIL	
	73:17	74:2			R, P, MIL	
	75:7	75:20			R, P, MIL	
	75:23	77:6			R, P, MIL	
	77:15	78:24			R, P, MIL	
	79:2	80:3			R, P, MIL	
	80:12	81:11			R, P, MIL	
	81:13	81:13			R, P, MIL	

	Plaintiff's D	esignations	Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations
DEPONENT	BEGIN	END	BEGIN	END	
Bartholomew	10:23	14:14	Google object	s to this entire of	leposition
Furrow			because nXn,	LLC. has not pr	operly
				e testimony that	
				nstead, nXn, LI	
				rly the entire de	
				ing to provide of	
				n, LLC. engages	
				designate a reas	onable
	14.10	10.25	amount of test	imony.	<u> </u>
	14:19	19:25			
	20:2	22:1			
	22:3 26:2	25:23 28:20			
	28:22	30:23			
	31:10	33:19			
	34:2	36:8			
	34.2 36:14	36:25			
	37:2	37:21			
	37:23	38:21			
	38:23	39:6			
	39:8	44:21			
	45:7	46:21			
	46:25	54:17			
	54:24	57:21			
	58:2	61:5			
	61:10	62:13			
	62:21	62:22			
	63:2	63:6			
	63:8	64:1			
	64:3	66:24			
	67:1	67:7			
	67:9	68:5			
	68:7	70:16			
	70:18	79:3			
	79:5	83:2			
	83:14	88:3			
	88:10	88:18			
	89:2	96:15			
	97:20	101:11			
	101:19	107:25			
	108:2	109:24			

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations	
DEPONENT	BEGIN	END	BEGIN	END	8	
	110:3	117:5				
	117:7	120:7				
	120:13	127:6				
	127:10	128:5				
	128:10	131:15				
	131:19	134:2				
	134:13	135:6				
	135:11	137:4				
	137:16	149:1				
	149:5	152:8				
	152:10	154:18				
	155:1	158:16				
	159:5	159:19				
	159:21	160:11				
	160:15	161:6				
	161:8	177:9				
	177:18	178:6				
	178:12	180:24				
	181:11	183:1				
Matthew Hall	8:20	10:8	Yahoo objects	Yahoo objects to this entire deposition because nXn, LLC. has not properly designated the testimony that is seeks to play at trial. Instead, nXn, LLC. chose to		
	10:10	19:4				
	19:14	22:14				
	22:20	25:22				
	26:4	28:6	designate near	rly the entire de	eposition.	
	28:8	28:13	Yahoo is willi	ng to provide of	bjections	
	28:16	29:22	only after nXr	n, LLC. engage	s in a good	
	29:25	39:13	faith effort to	designate a rea	sonable	
	39:16	39:20	amount of test	timony.		
	39:24	45:3				
	45:5	52:9				
	52:17	61:20				
	61:23	73:20				
	73:23	74:12				
	74:15	77:10				
	77:13	78:18				
	79:8	83:9				
	83:12	99:10				
	99:13	105:25				
	106:9	107:23				
Brian Horling	11:15	12:4		s to this entire LLC. has not p		

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations
DEPONENT	BEGIN	END	BEGIN	END	
			designated the testimony that is see play at trial. Instead, nXn, LLC. ch designate nearly the entire deposition Google is willing to provide object:		LC. chose to position.
			only after nXi faith effort to amount of tes	s in a good	
	12:13	12:15			
	12:19	13:24			
	14:9	14:11			
	14:13	14:22			
	14:24	15:15			
	15:17	16:17			
	16:19	17:10			
	17:12	19:13			
	19:15	20:20			
	20:22	23:3			
	23:5	24:5			
	25:7	26:1			
	26:3	26:19			
	26:21	27:9			
	27:11	28:20			
	29:25	30:16			
	30:21	32:3			
	32:6	33:13			
	33:15	35:6			
	35:8	36:23			
	36:25	37:8			
	37:10	39:20			
	39:22	40:9			
	40:11	40:20			
	40:22	41:6			
	41:8	42:18			
	43:2	44:7			
	44:9	44:11			
	45:3	45:10			
	45:14	45:19			
	45:24	47:1			
	47:3	47:10			
	47:13	48:11			
	48:13	49:6			

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations	
DEPONENT	BEGIN	END	BEGIN	END	Designations	
	49:8	52:6				
	52:8	53:24				
	54:1	58:10				
	58:12	59:22				
	59:24	61:12				
	61:17	64:13				
	64:15	65:6				
	65:8	68:15				
	68:17	68:21				
	68:23	72:5				
	72:7	72:16				
	72:18	73:14				
	73:18	74:14				
	74:23	78:9				
	78:23	79:21				
	79:23	84:4				
	84:10	86:7				
	86:9	89:6				
	89:9	94:16				
	94:18	96:22				
	97:9	99:11				
	99:16	100:14				
	110:16	110:15				
	101:17	102:13				
	102:15	103:15				
	103:17	111:20				
	111:22	112:8				
	112:10	112:16				
	112:18	113:2				
	113:4	117:7				
	117:9	122:19				
	122:21	126:3				
	126:5	127:1				
	127:22	130:7				
	130:9	132:24				
	133:1	135:1				
	135:3	137:7				
	137:9	137:22				
	137:24	138:7				
	138:18	140:4				
Michael Jahr	11:13	15:19	Google objects	to this entire	deposition	

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations
DEPONENT	BEGIN	END	BEGIN	END	
			because nXn,	LLC. has not pi	roperly
				testimony that	
			play at trial. I	nstead, nXn, LI	LC. chose to
			designate near	ly the entire de	position.
				ing to provide of	
				n, LLC. engages	
				designate a reas	sonable
			amount of test	timony.	1
	15:22	23:10			
	23:13	39:12			
	39:23	41:22			
	42:4	46:17			
	46:21	55:21			
	56:3	59:25			
	60:19	61:16			
	61:18	77:12			
	77:15	89:16			
	89:18	90:15			
	90:17	93:17			
	94:1	98:12			
	98:14	99:21			
	99:25	103:11			
	103:13	104:1			
	104:24	107:4			
	107:6	115:2			
	115:12	116:9			
	116:11	117:15			
	117:17	125:21			
	126:3	126:18			
	127:19	133:7			
	133:23	135:10			
	135:12	136:22			
Ashvin Kannan	7:19	20:4		s to this entire d	
	20:15	23:3		LLC. has not pr	1 "
	24:10	24:14		testimony that	
	25:1	25:25		play at trial. Instead, nXn, LLC. chose to	
	26:3	27:10	_	ly the entire de	
	27:12	30:21		ng to provide o	
	30:23	31:8		n, LLC. engages	
	32:21	34:3		designate a reas	sonable
	34:5	34:17	amount of test	urnony.	

	Plaintiff's Designations			Defendants' Counter- Designations	
DEPONENT	BEGIN	END	BEGIN	END	Designation
- ' '	34:19	35:14		·	I
	35:16	37:3			
	37:5	39:6			
	39:8	41:18			
	41:21	42:5			
	42:7	43:13			
	43:16	45:2			
	45:8	45:14			
	46:21	47:12			
	47:14	48:20			
	48:22	48:15			
	48:17	50:4			
	50:6	51:1			
	51:3	51:18			
	51:20	52:13			
	52:16	54:8			
	54:10	56:16			
	56:18	57:10			
	57:12	57:16			
	57:18	61:7			
	61:9	62:22			
	63:9	64:17			
	64:19	66:18			
	66:20	66:23			
	66:25	68:19			
	68:21	69:2			
	69:4	71:1			
	71:3	75:5			
	75:7	76:15			
	77:12	79:4			
	79:10	83:16			
	83:18	86:15			
	86:17	91:25			
	92:1	92:22			
	93:8	94:8			
	94:10	96:12			
	96:14	96:22			
	98:2	99:17			
	100:23	100:25			
David Kolm	8:6	16:9	Yahoo objects	to this entire	deposition
	17:16	17:20	because nXn, I		

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations
DEPONENT	BEGIN	END	BEGIN	END	
	17:25	18:4	designated the	e testimony that	is seeks to
	18:7	20:17	play at trial.	Instead, nXn, Ll	LC. chose to
	21:10	21:12	designate near	rly the entire de	position.
	22:1	29:17		ing to provide o	
	29:19	30:6		n, LLC. engages	
	30:10	37:25		designate a reas	sonable
	38:3	39:6	amount of tes	timony.	
	39:8	39:9			
	39:11	42:24			
	43:9	43:17			
	43:19	65:2			
	65:5	76:1			
	76:15	77:12			
	77:14	78:21			
	78:24	79:6			
	79:8	82:17			
	85:4	85:6			
	85:8	86:1			
	88:10	89:17			
Ken Kronquist	9:23	15:4	Yahoo objects	s to this entire d	leposition
	15:6	17:5	because nXn,	LLC. has not p	roperly
	17:11	31:23		e testimony that	
	32:14	36:15		Instead, nXn, Ll	
	37:2	41:11		rly the entire de	
	41:21	41:25		ing to provide o	
				n, LLC. engages	
				designate a reas	sonable
	10.10	1.7.0	amount of tes	timony.	1
	42:12	45:3			
	46:3	46:12			
	46:23	47:15			
	47:19	48:11			
	49:11	49:21			
	49:24	50:15			
	50:23	51:11			
	51:19	54:13			
	54:21	56:4			
	56:9	60:12			
	60:16	62:5			
	62:13	64:13			
	64:19	65:15			

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations
DEPONENT	BEGIN	END	BEGIN	END	
	66:3	67:18			
	68:3	69:19			
	70:11	74:13			
	74:15	76:15			
	76:17	83:9			
	84:19	85:18			
	87:17	88:6			
	88:8	99:15			
	99:17	99:21			
	99:23	101:8			
	101:13	105:18			
Soren Riise	8:4	19:22	Yahoo objects	to this entire d	eposition
	20:8	24:19		LLC. has not p	
	24:23	33:24	designated the testimony that is seeks to		
	31:1	37:6	play at trial. Instead, nXn, LLC. chose to		
	37:8	38:14	designate nearly the entire deposition.		
	38:16	38:18	Yahoo is willing to provide objections		
	38:20	41:22	only after nXn, LLC. engages in a good		
	42:4	43:11	faith effort to designate a reasonable		
			amount of test	imony.	T
	43:18	47:19			
	48:9	48:12			
	48:18	50:4			
	50:6	54:2			
	54:5	56:21			
	56:23	60:17			
Ben Shahshahani	9:6	9:20		to this entire d	
	10:6	11:18		LLC. has not p	
	11:20	12:22	_	testimony that	
	12:24	15:1		nstead, nXn, Ll	
	15:3	28:9		ly the entire de	
	28:11	31:15		ng to provide o	
	31:17	32:23	_	, LLC. engages	-
	33:9	35:4		faith effort to designate a reasonable	
	35:7	36:1	amount of test	ımony.	
	36:3	37:3			
	37:5	38:2			
	38:4	42:15			
	42:17	44:6			
	44:14	44:23			
	44:25	45:9			

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations
DEPONENT	BEGIN	END	BEGIN	END	
	45:11	45:20		·	
	45:22	46:12			
	46:17	62:14			
	63:5	73:10			
	73:17	74:5			
	74:13	77:7			
	78:17	82:12			
	82:14	82:18			
	82:20	82:25			
	83:2	83:24			
	84:1	84:11			
	84:13	87:3			
	87:5	89:13			
	89:15	92:1			
	92:3	97:5			
	97:11	97:13			
	97:15	98:14			
	98:21	103:8			
	104:7	104:13			
	104:22	105:8			
	105:10	113:5			
	113:19	116:12			
	116:14	117:2			
	117:4	117:12			
	117:14	117:19			
	117:21	118:12			
	118:14	123:3			
	123:11	124:14			
	124:16	131:23			
	132:12	132:17			
	133:7	133:15			
	133:17	140:20			
	140:22	141:07			
	141:09	145:13			
	145:15	148:5			
	148:22	149:14			
	149:16	152:2			
	153:7	158:13			
	158:15	162:17			
	163:6	165:11			
	165:13	165:18			

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations	
DEPONENT	BEGIN	END	BEGIN	END		
	165:20	171:8				
	171:15	172:2				
	172:23	176:16				
	176:18	177:21				
	178:6	181:12				
	182:19	183:20				
	184:25	185:17				
	186:20	186:21				
	186:23	187:5				
	187:7	187:11				
	187:14	188:1				
	188:8	188:12				
	189:1	189:4				
Zachary Zhang	6:4	12:5	Yahoo objects	to this entire of	deposition	
<i>y S</i>	12:10	16:15		because nXn, LLC. has not properly		
	16:17	25:13	designated the testimony that is seeks to			
	25:15	26:15	play at trial. Instead, nXn, LLC. chose to			
	26:17	27:1	designate nearly the entire deposition.			
	27:3	27:11	Yahoo is willing to provide objections			
	27:13	30:8	only after nXn, LLC. engages in a good			
	30:10	30:15	faith effort to designate a reasonable			
	30:17	35:18	amount of test	imony.		
	35:24	37:6				
	37:8	38:19				
	39:1	40:10				
	40:18	42:8				
	42:16	42:19				
	42:21	54:19				
	55:1	64:22				
	65:4	68:4				
	68:8	68:13				
	68:15	80:9				
	81:1	81:23				
	82:4	82:11				
	90:14	91:7				
	91:9	91:16				
	91:18	91:23				
Ilya Geller		7 - 1 - 2 - 2	Defendants object to Mr. Geller's testimony being presented by deposition because he is in Plaintiff's control, Plaintiff did not make him fully available			

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations
DEPONENT	BEGIN	END	BEGIN	END	
			motion for san made a showi testify at trial. reference t	ng that he is u Defendants in heir designation	aintiff has not navailable to ncorporate by ons of this
	100.17	198:20	WI	tness' depositi	
	198:17				P, R
	199:17	199:25			MIL, P, R
	200:2 201:25	200:19 201:25			MIL, P, R
	201.23	201.23	202:24	203:12	P, R
		202:23	202:24	203.12	P, R
	215:9				MIL, P, R
	216:10	216:15			MIL, P, R
	216:19	216:25			MIL, P, R
	217:2	217:3			MIL, P, R
	225:17	225:19			MIL, P, R
II C 11	226:6	226:21	0.6	0.7	MIL, P, R
Ilya Geller	9:8	9:11	9:6	9:7	MIL, P, R
	13:14	13:18			I, P, R
	13:24 14:2	13:25			I, P, R
		14:2			I, P, R
	101:12	101:25 102:22			MIL, P, R
	102:2 128:11				MIL, P, R
		128:25			MIL, P, R
	129:2	129:25			P, R
	130:2	130:24			P, R
	131:14	131:25			MIL, P, R
	132:2	132:9			MIL, P, R
	132:12	132:25			MIL, P, R
	133:2	133:20			R, P
	133:22	133:25			R, P
	134:3	134:16			R, P
	135:6	135:10			P, R
	135:16 135:21	135:19 136:2			P, R
	135:21	136:22			P, R P, R
	136:24	130.22			·
	138:2	137.9			P, R L
	138:9	138:22			L
	139:4	138:22			
	139:4	139:18			L, A, C L, A
	137.20	139.24			L, A

	Plaintiff's Designations		Defendants' Counter- Designations		Dfdts.' Objections to Pl.'s Designations
DEPONENT	BEGIN	END	BEGIN	END	
	140:5	140:7			L, A
	140:13	141:4			L, A
	141:6	141:7			L, A L, A
	142:8	142:25			L, A
	143:2	143:14			L, A
	143:22	143:25			P, R
	144:2	144:6			P, R, L
	144:9	144:12			P, R, L
	144:15	144:16			P, R, L
	144:18	144:25			P, R
	145:2	145:13			P, R, F
	145:15	145:22			P, R, F
	145:24	145:25			P, R
	146:2	146:5			MIL, P, R, L
	146:7	146:9			MIL, P, R
	146:12	146:17			MIL, P, R
	146:19	146:20			MIL, P, R,
	146:23	146:23	146:24	147:8	MIL, P, R
	147:11	147:18			P, R
	147:22	147:25			P, R, F
	148:2	148:3			P, R, F
	148:6	148:20			P, R
	148:22	148:25			P, R, F, L,
	149:2	149:9			MIL, P, R
	149:14	149:25			P, R
	150:2	150:16			MIL, P, R